

BEFORE

THE PUBLIC SERVICE COMMISSION OF

SOUTH CAROLINA

DOCKET NO. 2019-281-S

IN RE:

Application of Palmetto Utilities,)	
Incorporated for Adjustment (Increase) of)	SOUTH CAROLINA OFFICE OF
Rates and Charges, Terms and Conditions,)	REGULATORY STAFF'S MOTION FOR
for Sewer Service Provided to Customers)	LEAVE TO FILE TESTIMONY AND
in its Richland and Kershaw County)	EXHIBITS UNDER SEAL
Service Areas)	

The South Carolina Office of Regulatory Staff (“ORS”) respectfully moves the Public Service Commission of South Carolina (“Commission” or “PSC”) for leave to file the unredacted testimony of Witness Daniel P. Hunnell II, along with Exhibits DPH-9, DPH-10, and DPH-11 (“Confidential Exhibits”), under seal. The material contained in this testimony and these exhibits have been deemed confidential by Palmetto Utilities, Incorporated (“Company” or “PUI”). If review of the materials is necessary for a ruling on this Motion, ORS will provide the materials and information in question for review by the Commission or the Hearing Officer upon request.

Witness Hunnell’s redacted testimony and the Confidential Exhibits contain material provided to ORS by the Company through the discovery process, pursuant to S.C. Code Ann. §§ 58-4-50 and 58-4-55. While the Company maintains this material is confidential and protected from disclosure, ORS asserts that this material is necessary to support its position in this Docket, and the disclosure of the material to the Commission will not be unduly prejudicial to the Company. Further, filing the unredacted testimony and exhibits under seal provides adequate

protection for any information the Company asserts is confidential or proprietary. The redacted testimony relates to ORS's review and recommendations regarding Balance Sheet 114: Utility Plant Acquisition Adjustments. The exhibits for which the Company claims confidentiality protections concern the Company's balance sheet regarding Account 114, audit information requests ORS served regarding Account 114 and the Company's responses thereto, and a chart illustrating how the Company fits within the organizational structure of the holding company, Pacolet Milliken, among other subjects. This information is all pertinent to support ORS's positions and its adjustments.

In order for the Commission to make fully informed decisions in this Docket, it is imperative that the Commission have access to all relevant information. By allowing Witness Hunnell's unredacted testimony and Confidential Exhibits to be filed under seal, the Commission will be provided the opportunity to review all necessary information that supports ORS's positions without any confidential information being disclosed to the public.

Respectfully submitted,

s/ Jenny R. Pittman

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May 27, 2020